

IN THE UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT

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TECHNOLOJOY LLC,

*Plaintiff-Appellant,*

v.

BHPH CONSULTING SERVICES, LLC d/b/a  
BHPH CAPITAL SERVICES

*Defendants-Appellees.*

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On Appeal from the United States District Court  
for the Southern District of Florida, Miami Division  
District Court Case No., 19-23770-CIV-MORENO

**APPELLANT'S RESPONSE TO JURISDICTIONAL QUESTION**

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*Technolojoy, LLC*

Pursuant to the Clerk of Court's Notice dated April 26, 2023, Appellant, Technolojoy, LLC, through counsel, hereby submits its Response to the Jurisdictional Question:

1. The jurisdictional allegations in the First Amended Complaint [District Court D.E. # 101] appear to be inadequate.
2. The jurisdictional allegations in the First Amended Complaint will be amended on appeal, pursuant to 28 USC § 1653, to cure the jurisdictional deficiencies.
3. Appellant Technolojoy, LLC will be filing a motion for leave to amend on appeal the First Amended Complaint to correct the deficient allegations of citizenship.
4. If necessary, the record may be supplemented with additional evidence to demonstrate the parties' citizenship.
5. Appellant Technolojoy, LLC's Amended Certificate of Interested Person and Corporate Disclosure Form is attached hereto as Exhibit 1.

Respectfully submitted,

/s/ Fernando S. Aran  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 9, 2023, a copy of the foregoing was electronically filed with the Clerk of Courts. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Fernando S. Aran

Fernando S. Aran (#349712)

# EXHIBIT 1

## USCA11 Case: 23-10874 Document: 21 Date Filed: 05/09/2023 Page: 5 of 6

**Technolojoy, LLC** vs. **BPHP Consulting Services, et al.** Appeal No. **23-10874-D**

*(please type or print legibly):*

See attached addendum (due to limited space)

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***Technolojoy, LLC v./ BHPH Consulting Services, LLC, et al.***  
**United States Court of Appeals, Eleventh Circuit**  
**Case No. 23-10874-D**

**Addendum to Amended Certificate of Interested Persons and  
Corporate Disclosure Statement**

1.
  - a. Appellant Technolojoy, LLC is a limited liability company organized under the laws of the State of Florida.
  - b. Appellant Technolojoy, LLC is a citizen of the State of Florida.
  - c. Appellant Technolojoy, LLC has its principal place of business located in Miami-Dade County, Florida at 9971 NW 86th Terrace, Doral, Florida 33178.
  - d. Florida is the only state of which Appellant Technolojoy, LLC is a citizen.
  - e. Appellant Technolojoy, LLC is not a citizen of the State of Georgia or the State of Texas.
2.
  - a. Ibrahim Algahim is the sole member of Technolojoy, LLC and owns one hundred (100) percent membership interest in Technolojoy, LLC.
  - b. Ibrahim Algahim is a citizen of the State of Florida.
  - c. Ibrahim Algahim is domiciled in the State of Florida at 9971 NW 86th Terrace, Doral, Florida 33178.
  - d. Ibrahim Algahim has been citizen of the State of Florida since 2015 and intends to continue to live in Florida.
  - e. Plaintiff Ibrahim Algahim is not a citizen of the State of Georgia.
  - f. Plaintiff Ibrahim Algahim is not a citizen of the State of Texas.
3.
  - a. Appellee BHPH Consulting Services, LLC is a limited liability company organized under the laws of the State of Georgia.
  - b. Appellee BHPH Consulting Services, LLC is a citizen of the State of Georgia.
  - c. Appellee BHPH Consulting Services, LLC has its principal place of business in Georgia, at 685 Village Field Court, Suwanee, Georgia 30024.
  - d. Appellee BHPH Consulting Services, LLC is not a citizen of the State of Florida.
4.
  - a. Appellee Sean Fouzailoff is a member of BHPH Consulting Services, LLC and owns a 50% membership interest in BHPH Consulting Services, LLC.
  - b. Appellee Sean Fouzailoff is a citizen of the State of Texas.
  - c. Appellee Sean Fouzailoff is domiciled in the State of Texas at 2031 Westcreek Lane, Apartment 201, Houston, Texas 77027.
  - d. Appellee Sean Fouzailoff is not a citizen of the State of Florida.
5.
  - a. Appellee Anatoliy Slutskiy is a member of BHPH Consulting Services, LLC and owns a 50% membership interest in BHPH Consulting Services, LLC.
  - b. Appellee Anatoliy Slutskiy is a citizen of the State of Georgia.
  - c. Appellee Anatoliy Slutskiy is domiciled in the State of Georgia, at 3770 Elder Field Lane, Cumming, Georgia 30040.
  - d. Appellee Anatoliy Slutskiy is not a citizen of the State of Florida.